

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

AMANDA CIGANIK,	:	CASE NO. 2:09-cv-00621
	:	Judge William L. Standish
Plaintiff,	:	
	:	
v.	:	
	:	<b>DEFENDANT'S FIRST SET OF</b>
GC SERVICES LIMITED	:	<b>INTERROGATORIES AND REQUEST</b>
PARTNERSHIP,	:	<b>FOR PRODUCTION OF DOCUMENTS</b>
	:	<b>TO PLAINTIFF AMANDA CIGANIK</b>
Defendant.	:	

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Now comes Defendant GC Services Limited Partnership (“Defendant”), by and through counsel, and demands that Plaintiff Amanda Ciganik answer the attached Interrogatories and Request for Production of Documents in accordance with Rules 33 and 34 of the Federal Rules of Civil Procedure. Said Interrogatories shall be answered in writing and under oath within thirty (30) days after service and shall be of a continuing nature and supplemented as necessary. All answers shall be provided on the basis of personal knowledge or on the basis of constructive knowledge as this may be imputed to you from any agent or attorney.

Defendants hereby also request that Amanda Ciganik produce the following documents for inspection and copying at the law offices of Thorp Reed & Armstrong, LLP. Said documents shall be produced thirty (30) days from the date of this request.

**FIRST SET OF INTERROGATORIES**

1. State the name, address, date of birth and social security number of each person who assisted in, was consulted or contributed to responding to these interrogatories.

**ANSWER:**

2. List all addresses where you have resided during the last ten years including the city, township, or village of such address, county of each address, and the dates you resided at each address.

**ANSWER:**

3. What are the name and last known home address and telephone number of each person who witnessed all or any portion of the incidents described in your Complaint?

**ANSWER:**

4. What person or persons have any knowledge or information about any of the allegations or any of the facts underlying any of the allegations set forth in your Complaint?

**ANSWER:**

5. What is the name and address of each person you expect, hope, or anticipate calling as an expert witness at trial, and what is the subject on which each such expert is expected to testify?

**ANSWER:**

6. What is the name and address of any other person you hope, anticipate, or expect to call as a lay witness at the trial of this case and what is the subject on which each such witness is expected to testify?

**ANSWER:**

7. State your place of employment during the events alleged in the Complaint, and for the immediately preceding ten (10) year period, and the dates of hire and separation from employment.

**ANSWER:**

8. With what employees, representatives, or agents of GC Services Limited Partnership have you communicated concerning any matter surrounding the incidents described in your Complaint?

**ANSWER:**

(a) On what date did each such communication take place and with whom?

**ANSWER:**

(b) What was the substance of each such communication?

**ANSWER:**

9. Do you, your attorney, or anyone else acting in your behalf, have in your, his, her and/or their possession or control any statement made by any person, either oral or written, which is related to the incidents which are the subject of your Complaint?

**ANSWER:**

10. If your answer to the foregoing Interrogatory was in the affirmative, please state what are the verbatim contents of each such statement or, in the alternative, attach a copy thereof in lieu of your response to this question.

**ANSWER:**

11. What are the name, office address, and specialty, if any, of each physician or practitioner of any healing art who has seen or treated you for any physical or mental complaint or condition, which you claim to be related in any way to the incidents that you describe in your Complaint?

**ANSWER:**

12. What is the name and address of each hospital in which you have been confined as an inpatient or treated as an outpatient for any complaint or condition, which you claim to be related in any way to the incidents that are the subject of your Complaint?

**ANSWER:**

13. What is the name, office address and specialty, if any, of each physician or practitioner of any healing art who has seen or treated you for any physical or mental complaint or condition within the past ten years?

**ANSWER:**

14. What is the name and address of each hospital in which you have been confined as an inpatient or treated as an outpatient for any complaint or condition within the past ten years?

**ANSWER:**

15. Describe how you were humiliated as a result of the incidents described in your Complaint.

**ANSWER:**

16. Describe how you were embarrassed as a result of the incidents described in your Complaint.

**ANSWER:**

17. Have you at any time been a party to any lawsuit other than this case and if so what is the caption, its court, case number and status of each such case?

**ANSWER:**

18. If you have ever been charged with and pled guilty to, or been convicted of a crime where the crime was punishable by death or imprisonment in excess of one year, or involved dishonesty or false statement regardless of the punishment, please specify the court, docket number, caption, date of conviction, the nature of each offense, and the penalty imposed upon each conviction.

**ANSWER:**

19. List all personal, business and employer phone numbers you used in the five (5) year period preceding the incidents described in your Complaint and indicate the name on the account and whether the number is a cell phone, home phone, or employer phone number.

**ANSWER:**

20. Identify your father's full name and all phone numbers used by your father in the five (5) year period preceding the incidents described in your Complaint.

**ANSWER:**

21. Itemize your actual damages which you claim to have suffered as a result of the incidents that are described in your Complaint.

**ANSWER:**

22. If you response to Request for Admission No. 1 is anything but an unqualified admission, please describe in detail the communication that took place between Defendant and your father.

**ANSWER:**

**PRODUCTION OF DOCUMENTS**

Please produce:

1. Any and all photographs, videotapes, audiotapes, diagrams, sketches, maps or other similar documents relating to the occurrences which form the subject matter of your Complaint.
2. Any and all medical and hospital reports and records which pertain, refer or relate to each hospital in which you were confined as an inpatient or treated as an outpatient for any complaint or condition which you claim to be related in any way to the incidents which form the subject matter of your Complaint.
3. Any and all written records, reports, statements or opinion letters and any other documents made by each and every physician or practitioner of any healing art who has seen or treated you for any physical or mental condition which you claim to be related to the injuries set forth in the your Complaint.
4. Any and all medical and hospital reports and records which pertain, refer or relate to each hospital in which you were confined as an inpatient or treated as an outpatient for any complaint or condition within the past ten years, whether or not related in any way to the incidents which form the subject matter of your Complaint.
5. Any and all written records, reports, statements or opinion letters and any other documents made by each and every physician or practitioner of any healing art who has seen or treated you for any physical or mental condition within the past ten years, whether or not related in any way to the incidents which form the subject matter of your Complaint.
6. Any and all reports of investigators or experts furnished to you, your attorney, or other representative acting on your behalf concerning any matters related to this lawsuit.
7. All documents which you intend to mark as exhibits or introduce into evidence at trial.
8. Any and all articles, textbooks, or literature of any other description that you may use in any way or for any purpose, including that of impeachment, at the trial of this case.

9. Any and all documents that pertain, refer, or relate, in any way, to your claim for damages.
10. Any and all documents that you refer to, in any way, in responding to the First Set of Interrogatories propounded by Defendant.
11. Any and all documents that pertain, refer, or relate, in any way, to any of the allegations or to any of the facts underlying any of the allegations in your Complaint.
12. All statements, sworn or unsworn, signed or unsigned, recorded or written, made by any person, that is in any manner related to the incidents, which are the subject of your Complaint.
13. All documents, which prove, tend to prove, disprove or tend to disprove your allegations directed against the Defendant.
14. All phone records related to the incidents that are the subject of your Complaint including records of all inbound and outbound calls.

Respectfully submitted,

Dated: August 11, 2009

/s/ Mackenzie A. Baird

Robert J. Hannen  
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Mackenzie A. Baird  
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GC Services Limited Partnership*

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	:	Judge William L. Standish
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	:	
v.	:	
	:	
GC SERVICES LIMITED	:	
PARTNERSHIP,	:	
	:	
Defendant.	:	

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**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a copy of the foregoing Defendant's First Set of Interrogatories and Request for Production of Documents has been served, via electronic mail, this 11<sup>th</sup> day of August 2009, upon the following counsel of record:

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